ComNav Technology Ltd.
Building 2, No.618 Chengliu Middle Rd. Shanghai 201103, China

Date: October 25, 2023

FCC ID: 2ACHBJUPITER

Model Number: Jupiter

To: Federal Communication Commission
Authorization and Evaluation Division 7435 Oakland Mills Road
Columbia, MD 21048

Subject: Extend Frequencies Justification Original Application **FCC ID: 2ACHBJUPITER**

To Whom It May Concern,

We, **ComNav Technology Ltd.** declares that the GNSS Receiver meets 47 CFR Section 90.203(j)(4) and 90.203(j)(5) spectrum efficiency requirement;
The GNSS Receiver is support both 12.5 KHz for GMSK (Digital modulation; Emission Designator: 7K60G1D for data mode), also the GNSS Receiver designed in accordance with ETSI TS 102 361-1 requirement, will at least support 9600 bits per second in a 12.5 KHz channel bandwidth in a 12.5 KHz channel bandwidth, GMSK will use 2 times slots in one 12.5 KHz bandwidth accordance to ETSI TS 102 361-1, which equal with 9600/2 = 4800 bits per second in one 6.25 KHz channel bandwidth;

We, **ComNav Technology Ltd.** declares that the GNSS Receiver capable of operating on the nationwide public safety interoperability calling channel (453.2125 MHz), meets 47CFR Section 90.203(j)(1) requirement;

Should you have any questions or comments regarding this matter, please have my best attention.

Sincerely,

(Signed)
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